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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 JAMES RUHLMANN and ERIC SAMBOLD,

10 Plaintiffs,

11 vs.

12 GLENN RUDOLFSKY, individually, and  
13 KIM D. RUDOLFSKY, individually, and  
14 HOUSE OF DREAMS KAUAI, INC.,  
a New York Domestic Business Corporation,

15 Defendants.

Case No.: 2:14-cv-00879-RFB-NJK

**MOTION TO CONTINUE DEPOSITION  
OF KIM RUDOLFSKY  
(FIRST REQUEST)**

16 COMES NOW Defendant Kim Rudolfsky, by and through counsel, and moves for an Order of  
17 this Court continuing the deposition currently scheduled for October 18, 2016, in Las Vegas, Nevada. In  
18 support of her Motion, Mrs. Rudolfsky respectfully states as follows:

19 **BACKGROUND**

20 Plaintiffs initially scheduled Mrs. Rudolfsky's deposition for September 29, 2016, and agreed to  
21 reschedule until after October 8, 2016, to accommodate the parties' and counsel's schedule. The  
22 deposition was set for October 11, 2016, and moved to October 18, 2016.

23 In the meantime, Mrs. Rudolfsky has been experiencing symptoms related to a brain tumor at the  
24 base of her skull, which has been the subject of two prior brain surgeries. As a result, Mrs. Rudolfsky has  
25 booked the first available appointment in New York City with her neurosurgeon, Dr. Chandranath Sen,  
26 M.D., to begin testing of these symptoms and her recent condition. A letter confirming this appointment

1 with Dr. Sen is attached hereto as Exhibit "A." Dr. Sen is renowned for his expertise in this area of the  
2 brain and the attendant nerves and blood vessels, and it can be difficult to secure an appointment.

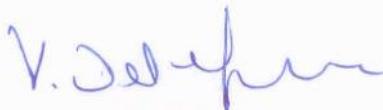
3 **REQUESTED RELIEF**

4 Though attempts had originally been made to move the deposition again to the 19<sup>th</sup> of October for  
5 significant airline cost savings, this request was denied by Plaintiffs. In any event, it did not adequately  
6 address the issues related to Mrs. Rudolfsky's condition. At this time, Mrs. Rudolfsky requests a  
7 continuance of a minimum of thirty days to allow for the neurology visit and follow up testing, including  
8 MRS and CT Scan, so that she may be cleared to fly by her doctor. Mrs. Rudolfsky would provide a  
9 status report to the Court following her appointment on the 18<sup>th</sup> and thereafter with respect to her ability  
10 to fly to Las Vegas for deposition.

11 **CONCLUSION**

12 Based on the foregoing, Kim Rudolfsky respectfully requests a continuance of her deposition  
13 until she receives clearance to fly by Dr. Sen.

14  
15 Respectfully submitted this 10<sup>th</sup> day of October, 2016.

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19 Valerie Del Grosso, Esq.  
20 Del Grosso Law, Ltd.  
21 Attorney for Defendant Kim Rudolfsky